

Date: September 3, 2020

From: Danielle Gaito

To: Schiller Station NPDES Permit File

Re: Memorandum Documenting September 3, 2020 Meeting Between EPA and Granite Shore Power Concerning the 2018 Schiller Station NPDES Permit BTA Requirements

On September 3, 2020, representatives of EPA Region 1 and Granite Shore Power LLC (GSP) held a conference call to discuss the BTA requirements of the 2018 Schiller Station NPDES Permit and the results of the 2019 wedgewire screen pilot study. Danielle Gaito prepared this memorandum to document the meeting.

I. Meeting Attended By:

Damien Houlihan (EPA), Danielle Gaito (EPA), Elizabeth (Lynn) Tillottson (GSP), and Allan Palmer (GSP).

II. Meeting Notes

GSP began the meeting explaining the changes at the facility since 2018 and results of the pilot study of wedgewire screens (WWS), and recommended that EPA to consider whether the BTA requirements of the 2018 Final Permit, which include a compliance schedule demonstrating progress towards the implementation of WWS, continue to be appropriate.

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the pilot study of the WWS indicated that the technology is not appropriate for this location. GSP asked if the permit requirements for the BTA could be “paused” to allow EPA to reconsider the determination given that the Facility does not currently operate and does not plan to operate the coal units with any consistency in the future.

EPA asked how long the units will be idle.

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EPA responded that it cannot “pause” a NPDES permit and any changes to the permit requirements would likely require a permit modification, including a new BTA determination and public comment period. This modification would take time and would not be completed prior to the next milestone in the compliance schedule, December 30, 2020. EPA suggested that non-compliance with a scheduled milestone could possibly trigger an Administrative Order. This

option, if possible, could offer an opportunity to reconsider the BTA while achieving short-term benefits by incorporating interim limits on operation of the units.

III. Next Steps

GSP and EPA agree to consider possible options and meet again the following week.